

# Exhibit F

**From:** Rock, Kenneth M - SOL <Rock.Kenneth.M@dol.gov>  
**Sent:** Wednesday, October 11, 2023 10:56 AM  
**To:** Doyle, Brion B.  
**Cc:** Russo, Rina R - SOL  
**Subject:** RE: Acting Secretary v. Forge

Hi Brion,

The Secretary is withdrawing its below offer to resolve the subpoena. We have determined that based on the volume of employee data, we cannot conduct this investigation without all of the information sought in the subpoena, including the full client list. Please let me know if Forge has reconsidered and will agree to provide the client list. If Forge continues to oppose this, we will reach out to the Court and ask to lift the stay and proceed with our motion to enforce the subpoena. If you would like to have a call to discuss any of this, I'm happy to do so.

Thanks,

Ken

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**From:** Rock, Kenneth M - SOL  
**Sent:** Thursday, October 5, 2023 9:28 AM  
**To:** Doyle, Brion B. <bdoyle@varnumlaw.com>  
**Cc:** Russo, Rina R - SOL <Russo.Rina.R@dol.gov>  
**Subject:** Acting Secretary v. Forge

Hi Brion,

Thanks for your help in setting up the interviews last week. We are looking at ways to resolve this subpoena, and would be willing to resolve the subpoena enforcement action/forego the contractor information if Forge would provide what we envision are "employee profiles" for all employees during the period of the subpoena request (March 21, 2020-present). These "employee profiles" should contain all information Forge would collect when a worker applies for a job. We envision these employee profiles would include (at least), the employees' job applications, photo IDs, any other photos of employees taken by Forge, and emergency contact information. We believe much of this information is responsive to #25 and #26 of the subpoenas (both IN and MI).

If this is something Forge would agree to, we would like to first get a sample of 10-15 of these employee profiles to make sure we don't need to ask for anything else and that this is a workable solution to the subpoena for us.

Please let me know if this is a solution Forge would agree to, and if you would like to discuss anything about this.

Thanks,

Ken

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Until further notice, please direct all communications to me via phone or email. Please do not send correspondence by paper mail, courier, or fax to the Cleveland Solicitor's Office.